**Working With Providers of Pre-ETS During COVID-19**

It is understandable during these uncertain times that providers are worried about their situation and the ability to maintain a viable business that delivers services both now and into the future.

Here are a few thoughts for consideration as you make plans in your agency around the provision of services.

1. Review contracts, agreements, or whatever purchasing mechanism you have with providers and determine the flexibilities that can be made given the purchasing regulations in your state.
2. Look at the possibilities of distance service provision and research the resources provided on the WINTAC.org website for possible curriculum, activities, and other modules/materials for providing services that can be delivered on-line or virtually.
3. Make sure the on-line activities the providers use are consistent; that you approve of the activities they are doing; and the curriculum they are using is aligned with the right required activity.
4. Determine the method you will use to ensure documentation of the customer’s attendance and progress. You need this to support payment.
5. Get creative when internet connectivity issues may be of concern. Consider mailing lessons or information to customers and having providers call and provide instruction over the phone.
6. For those with internet access, providers can use platforms like Zoom, Slack, Google Meet, and more to hold training with customers remotely.
   1. Use Video Remote Interpreting Options for Deaf customers.
7. Consider use of social media such as YouTube or Facebook live. You could provide a group training by creating a private group. Customers can access via their phone or computer. For YouTube, you could deliver content via video and link to a survey the student completes after viewing to document attendance.
8. Keeping customers engaged is key during this difficult and isolating time. Providers could help with regular check ins.
9. If providing services to students with disabilities who are still enrolled in the secondary school system, you may want to connect with the teacher, VR counselor or your point of contact in the school to discuss a plan for coordinating continued service provision for the student(s).
10. For providers who wish to provide Pre-ETS through pre-recorded lessons that are posted to a platform such as YouTube, you will want to consider what the provider is doing with the student before, during, and after they watch the lesson. Putting a lesson on YouTube or any other platform would not, by itself, constitute a services as there is no action taking place other than someone watching a video. What are they wrapping around it like activity sheets, or questions to respond to? Is someone leading a discussion afterwards with the student for reflection so they can discuss what was learned from the lesson? Have you approved this curriculum? How is it documented? Finally, is all of it happening within their scope of work or can you amend the contract temporarily to allow for an alternative method of delivery? As with all expenditures charged to the Federal Award, is it reasonable, necessary, allocable, and allowable.